IN THE MIDDLE DISTRICT OF ALABAMA MIDDLE DISTRICT DIVISION

2007 APR 26 A 10: 24

ANTHONY L. ADAMS, #180127

PLAINTIFF,

U.S. DISTRICT COURT

MIDDLE DISTRICT ALA

ACTION NO: 2.01-CV-351-MEF

PRISON HEAlth SERVICES

DOCTOR SIDDIQ,

DEFENDANT,

TORT CLAIM

COMES NOW, the PLAINTIFF, Anthony L. Adams, proceeding Pro-Se, and with inmate assistance, does file this COMPLAINT against the above named DEFENDANT, pursuant to the Code of Alabama, 1975 Title 6, SECTIONS $\underline{6-2-34}$ and $\underline{6-5-480}$, and submits the following causes of ACTION that would entitle PLAINTIFF to relief.

- 1). PLAINTIFF, Anthony L. Adams an inmate is housed at the Bullock County Correctional Facility at Post Office Box 5107 in Union Springs, Alabama 36089-5107
- 2). DEFENDANT, Doctor Siddiq is employed by the Alabama Department of Corrections, here at the Bullock County Correctional Facility, also in Union Springs, Alabama 36089-5107, where Petitioner Anthony L. Adams is housed.

CAUSE OF ACTION AND FACTS IN SUPPORT

The above named DEFENDANT has been negligent, in that and is responsible for the (Health and well-being of PLAINTIFF), and the above DEFENDANT has failed short in his duty, in regards to PLAINTIFF MEDICAL ATTENTION.

PLAINTIFF has suffered at the hands of the above DEFENDANT, "Physical Pain and Mental suffering", and the DENIAL of proper MEDICAL ATTENTION.

PLAINTIFF, has resided at the <u>BULLOCK COUNTY CORRECTIONAL FACILITY</u>, for roughly (years), complaining about his medical conditions, and the serious need to have a SPECIALIST look at him concerning the illness that was diagnosed by Dr. Ferguson in Mobile, Alabama on the 15th day of January, 1995 for irregular heart beat and bleeding ulcers, along with the functions of PLAINTIFF esophus, which is not functioning properly, however the above DFENDANT has turned a deaf ear to PLAINTIFF <u>Medical-Cry</u>, and pain.

PLAINTIFF, has constantly complained about the pain he has to endure, PLAINTIFF is not a medical doctor, but a victim who needs to visit a SPECIALIST, due to the overall analysis he

receives from the Medical-Staff, here at the BULLOCK COUNTY CORRECTIONAL FACILITY, where PLAINTIFF is held.

PLAINTIFF, has received ill treatment each and every time he attempts to explain why he needs to see a SPECIALIST about his illness, but its to no avail, PLAINTIFF only receives repercussion, in various forms from DEFENDANT such as its all in PLAINTIFF mind or PLAINTIFF is playing games, something PLAINTIFF states is Unconstitutional, and this Court must intervene, in an "EMERGENCY MODE."

PLAINTIFF, is suffering from bleeding ulcers, bad esophus, which prevents PLAINTIFF food to function normal, causing him to get strangle because it has gone bad or became default, leaving PLAINTIFF in an LIFE THREATENING PREDICAMENT.

PLAINTIFF has been examined on numerous occasions, and it has been to no avail, so PLAINTIFF is left to make due and continue to suffer. PLAINTIFF is compelled to summoning and seeks this Honorable Court Authority.

CONCLUSION

In view of the foregoing the PLAINTIFF has stated a cause of ACTION against the above named DEFENDANT as required by the Alabama Rules of Civil Procedure and Civil Practice of the Code of Alabama, 1975 and therefore is entitled to RELIEF in the amount of (\$500.000-Dollars), in actual damages and the amount of (One-Million-Dollars), in punitive damages for the physical pain and mental suffering PLAINTIFF must endure and had to endure, due to the above DEFENDANT (DR. SIDDIQ).

Respectfully Submitted.

Inthony L. Odamo Anthony L. Adams, Petitioner Bullock Correctional Facility

Post Office Box 5107

Union Springs, Alabama 36089-5107

NOTARY PUBLIC

Sworn and subscribed before me this 24 day of April, 2007.

NOTARN O LEACHY AT PURA LEGEMA AT LARGE MY COMMISSION EXPIRES: Apr 4, 2011

CERTIFICATE OF SERVICE

Onthony L. Adams, Petitioner
Post Office Box 5107
Union Springs, Alabama 36089-5107

CC: Middle District of Alabama United States Courthouse Post Office Box 711 Montgomery, Alabama 36104

> Doctor Siddiq, Department of Corrections Post Office Box 104 Union Springs, Alabama, 36089-5107

File: 4-24-67